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June 30, 2023

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VIA ECF FILING

Hon. Vernon S. Broderick
U.S. District Court Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
Single

Re: True Return Systems, LLC v. MakerDAO. SDNY-1-22-cv-08478-VSB

Dear Judge Broderick:

I write pursuant to the Court's recent order (the "Order") of June 21, 2023, in the action identified above (Dkt. No. 50). The Order requires Defendant MakerDAO ("MakerDAO") to retain counsel and for counsel to file a notice of appearance by today, June 30, 2023.

Since the entry of the Order, I have been in communication with representatives of MakerDAO and expect that MakerDAO will undertake a governance vote in the near future concerning retaining Perkins Coie LLP as counsel in action identified above. MakerDAO must undertake a governance vote to retain counsel—the process of which will be performed on the blockchain and takes at least seven days.

Accordingly, I respectfully request a 14-day extension of time (until July 14, 2023) for MakerDAO to comply with the Court's order (Dkt. No. 50) so that MakerDAO can carry out its governance vote about retaining Perkins Coie as counsel for the matter identified above.

Sincerely,

/s/ Gene Lee

Gene W. Lee

GWL:gwl

cc: Counsel for True Return Systems via ECF